

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	
To Ensure Compatibility with	)	CC Docket No. 94-102
Approaches to Wireless Enhanced 911	)	
Emergency Calling Systems	)	
	)	
Verizon Wireless Puerto Rico, Inc.	)	
Petition for Limited Waiver of Section	)	FCC 00-436
20.18(c) of the Commission's Rules and	)	
the Deadlines Established in the <u>Fourth</u>	)	
<u>Report and Order</u>	)	

**VERIZON WIRELESS PUERTO RICO, INC.'S QUARTERLY REPORT  
REGARDING E911/TTY COMPATIBILITY**

Pursuant to the Commission's Fourth Report and Order in CC Docket No. 94-102,<sup>1</sup> Verizon Wireless Puerto Rico, Inc. ("VWPRI"),<sup>2</sup> the CMRS affiliate of Puerto Rico Telephone Company, Inc. ("PRTC"), hereby submits its quarterly report regarding digital wireless compatibility with Text Telephone Devices ("TTY") in Puerto Rico.

Currently, VWPRI is capable of transmitting TTY information using analog channels through its dual mode cellular system. VWPRI's Planning Department (the "Planning Department") is responsible for completing the TTY data transmission requirements. As

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<sup>1</sup> Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Fourth Report and Order, 15 FCC Rcd 25216 (2000) ("Fourth Report and Order").

<sup>2</sup> Verizon Wireless of Puerto Rico, Inc. previously operated under the name of "Celulares Telefónica, Inc" ("CTI").

previously reported to the Commission, the Planning Department was advised by VWPRI's Data Services Group (the "Data Services Group") in August of 2001 that the TTY data transmission equipment would be installed by Ericsson Caribbean ("Ericsson") as part of a larger trial of data transmission equipment being tested by VWPRI. Unbeknown to the Planning Department, the Data Services Group terminated the trial of the data transmission equipment in October 2001, and unfortunately, all of Ericsson equipment was removed, including the TTY data transmission equipment.

The Planning Department became aware of the removal of the Ericsson equipment in January 2002. On learning of the removal of the equipment, VWPRI immediately commenced an internal review and contacted Ericsson to seek a proposal for the reinstallation of the necessary TTY data transmission equipment. After reviewing the proposal, VWPRI learned that Ericsson offers software that VWPRI can install in their current equipment that will permit VWPRI to transmit 911 calls from TTY devices over its digital system. Ericsson provided VWPRI with a new proposal for the TTY software, which VWPRI is currently evaluating. VWPRI and Ericsson are continuing to negotiate the terms of a license for the use of such software.

VWPRI plans to integrate, test, and deploy the technology purchased in conjunction with the public safety community in Puerto Rico. Based upon the proposed software delivery and installation dates that Ericsson Caribbean has provided, VWPRI estimates that it will be able to conduct testing with the Puerto Rico Public Safety Answering Point ("PSAP") during the third week of May 2002. VWPRI plans to achieve digital wireless compatibility with TTY throughout the island of Puerto Rico.

Additionally, VWPRI currently is unable to provide detailed information relating to the specifications of equipment and software developed to provide TTY-compatible service. Such information would have to be provided by VWPRI's equipment and software vendors because these vendors are directly involved in developing compliant equipment and software. Consequently, VWPRI urges the Commission to review the reports submitted by equipment and software vendors to obtain information concerning each vendor's development and testing activities.

Respectfully submitted,

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Dated: April 15, 2002